

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: ALEXANDER E. JONES Debtor.	§ § § § § §	Case No. 22-33553 (Chapter 11) JUDGE CHRISTOPHER M. LOPEZ
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**NOTICE OF RATE INCREASE OF CROWE & DUNLEVY, P.C.
AS CO-COUNSEL TO THE DEBTOR**

1. Pursuant to the *Order Granting Application for Entry of an Order Authorizing the Retention and Employment of Crowe & Dunlevy, P.C. as Debtor's Co-Counsel Effective as of the Petition Date* [Docket No. 104] (the "Retention Order")¹, Crowe & Dunlevy, P.C. ("C&D"), as co-counsel to the Debtor, submits this notice of rate increase.

2. Paragraph 5 of the Retention Order provides that prior to any increase in C&D rates for any individual employed by C&D and providing services in this Chapter 11 Case, C&D shall file a supplemental declaration with the Court and provide ten business days' notice to Debtor, the United States Trustee, Counsel for the Official Committee of Unsecured Creditors, Counsel to the Connecticut Plaintiffs, and Counsel to the Texas Plaintiffs.²

3. The supplemental declaration, attached as Exhibit "A," explains the basis for the requested rate increases in accordance with Bankruptcy Code section 330(a)(3)(F) and states whether Debtor has consented to the rate increase.

4. In the ordinary course, C&D has adjusted the hourly rates charged by its professionals and paraprofessionals. Effective as of January 1, 2024, the standard hourly rate

¹ Capitalized terms used by not otherwise defined herein shall have the meanings ascribed to such terms in the Retention Order.

² As such Notice Parties are defined in the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals.

ranges established by C&D for professionals and paraprofessionals employed in its offices are as set forth below:

Title	2024 Billing Rate Range
Shareholders/Directors	505 - 875
Associates	285 - 335
Paralegals	195 - 295

Dated: January 16, 2024.

CROWE & DUNLEVY, P.C.

By: /s/ Vickie L. Driver
Vickie L. Driver
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Christina W. Stephenson
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**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served upon all parties registered to receive notices via the Court's ECF noticing system, including the United States Trustee, on this 16th day of January, 2024.

/s/ Vickie L. Driver
Vickie L. Driver

EXHIBIT “A”

**IN THE UNITED STATES BANKRUPTCY COURT
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In re: ALEXANDER E. JONES Debtor.	§ § § § § §	Case No. 22-33553 (Chapter 11) JUDGE CHRISTOPHER M. LOPEZ
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**SUPPLEMENTAL DECLARATION OF VICKIE L. DRIVER IN SUPPORT OF
APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND
EMPLOYMENT OF CROWE & DUNLEVY, P.C. AS DEBTOR'S CO-COUNSEL**

I, Vickie L. Driver, state and declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:¹

1. I am a shareholder with the firm of Crowe & Dunlevy, P.C. ("C&D"). I am the lead attorney from C&D working on this Chapter 11 Case. I am a member in good standing of the Bar of the State of Texas. There are no disciplinary proceedings pending against me. Except as otherwise noted, I have personal knowledge of the matters set forth in this Declaration.

2. I submit this supplemental declaration (the "Supplemental Declaration") in support of the *Notice of Rate Increase of Crowe & Dunlevy, P.C. as Co-Counsel to the Debtor* (the "Rate Increase Notice"). The Rate Increase Notice seeks to inform the Court and all parties in interest of the annual rate increases for professionals at Crowe & Dunlevy, P.C.

3. I have read and am fully familiar with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules, and I am sufficiently competent to handle the various tasks that might be foreseeably expected of Debtor's counsel in this Chapter 11 Case.

¹ Capitalized terms used but not otherwise defined in this Declaration have the same meaning given to them in the Application.

C&D 2024 Rate Increase.

4. As of January 1, 2024, C&D implemented new and increased hourly rates for many of its professionals, including the two lawyers responsible for the majority of the work on this matter. The 2024 billing rates of the C&D attorneys expected to assist in the representation of Debtor are as follows:

<u>PROFESSIONAL</u>	<u>HOURLY RATES</u>	<u>INCREASED RATE</u>
Vickie L. Driver	\$795	\$875
Christina W. Stephenson	\$715	\$845
Nancy A. Collins	\$675	\$695
Craig M. Regens	\$595	\$595
Cindy C. Ottaway	\$520	\$560
J. Christopher Davis	\$475	\$505
Randall J. Yates	\$340	\$365
Deric J. McClellan	\$310	\$335
John H. Yoon	\$285	\$320

5. In addition, C&D may engage the services of one or more paraprofessionals as the need arises, whose rates presently range from \$195 to \$295 per hour. These hourly rates are subject to periodic adjustments, which customarily occur at the beginning of each calendar year.

6. To the extent that C&D subsequently discovers any facts bearing on this Supplemental Declaration, this Supplemental Declaration will be supplemented and those facts will be disclosed to the Court at the earliest opportunity.

7. Pursuant to 28 U.S.C. §1746(2), I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 16, 2024.

/s/ Vickie L. Driver
Vickie L. Driver